

UNITED STATES DISTRICT COURT

for the
District of South Carolina

In the Matter of the Search of

*(Briefly describe the property to be searched
or identify the person by name and address)*Priority Mail parcel 9505 5147 1698 9023 1816 60
addressed to Tom Taylor, 1087 M S Road Manning,
South Carolina 29102

Case No. 2:19-cr-123

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:
Priority Mail parcel 9505 5147 1698 9023 1816 60 addressed to Tom Taylor, 1087 M S Road Manning, South Carolina 29102, currently held in the possession of the United States Postal Inspection Service in Manning, South Carolina

located in the _____ District of _____ South Carolina _____, there is now concealed *(identify the person or describe the property to be seized)*:

evidence, fruits and/or instrumentalities of narcotics trafficking, narcotics

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 USC 841	Prohibited Acts - Distribution of Controlled Substance
21 USC 846	Attempt and Conspiracy

The application is based on these facts:
See attached affidavit.

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

L.R. Moody

Applicant's signature

L.R. Moody, U.S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: 01/25/2019

City and state: Charleston, SC

Judge's signature

Bristow Marchant, U. S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, L. R. Moody, depose and state the following,

1. I am employed by the United States Postal Inspection Service (USPIS) as a United States Postal Inspector and have been so employed in this capacity since 2005. I am currently assigned to the Charleston, South Carolina domicile where my investigative responsibilities include narcotics investigations through which the United States Mail is used to conceal and transport illegal and/or controlled substances from one location to another.
2. I make this affidavit based upon personal knowledge derived from my participation in this investigation and/or information I learned from discussions with other law enforcement officials, records and reports, sources of information, and witnesses.
3. Based on my training and experience, and the facts set forth in this affidavit, there is probable cause to believe that evidence of violations of Title 21 U.S.C. § 841(a)(1) and 21 U.S.C. § 846, are contained within Priority Mail parcel, **9505 5147 1698 9023 1816 60**, hereinafter referred to as "subject parcel."
4. The subject parcel is a United States Postal Service (USPS) Large Priority Mail box measuring 12x12x8. The subject parcel is addressed to Tom Taylor, 1087 M S Road Manning, South Carolina 29102, with a return address of Frank Hill, 9552 Blanche Avenue Garden Grove, California 92841. The subject parcel was mailed on January 23, 2019, from the Garden Grove, California Main Post Office. The subject parcel weighs 4 pounds and 7 ounces.



(Handwritten signature/initials)



5. I know from prior investigations and trafficking intelligence developed by U. S. Postal Inspectors and other law enforcement officials that the U. S. Postal Service's Express Mail and Priority Mail services are frequently used by drug traffickers for shipping illegal or controlled substances and/or proceeds from the sale of illegal or controlled substances including steroids, ecstasy, cocaine, heroin, marijuana, and derivatives thereof.
6. I also know from my training and experience that drug traffickers prefer overnight or priority delivery services because of their speed, reliability, and the ability to track the article's progress to the intended delivery destination. Additionally, I know from training and experience that some drug traffickers prefer to use the United States Postal Service instead of private delivery services, such as FedEx or UPS, because private companies do not always require search warrants to open or inspect the contents of parcels.
7. I know from my training and experience that the state of California is a source state for illegal and/or controlled substances being mailed throughout the United States. The proceeds from narcotic transactions are sometimes transported via the U. S. Mail, and other communication facilities, back to the source of the controlled substance.
8. Postal Inspector T. Gasser informed me the Postal Inspection Service, Drug Enforcement Administration, South Carolina Law Enforcement Division, and Clarendon County

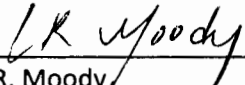
A handwritten signature or initials, possibly 'W', located at the bottom right of the page.

Sheriff's Office are conducting an investigation of individuals trafficking narcotics in the Manning, SC area. As such, on January 24, 2019, Postal Inspector Gasser reviewed parcel information in a USPS database when he identified the subject parcel destined for Manning, South Carolina.

9. On January 25, 2019, Postal Inspector Gasser recovered the subject parcel at the Manning Post Office. Upon examination, he noted that all the seams were taped shut. I know from training and experience that individuals shipping narcotics through the mail often tape the box seams in an effort to eliminate or reduce to odor of narcotics escaping the parcel.
10. A records search in CLEAR¹, a database commonly used by law enforcement, indicates no one by the name of name Tom Taylor is associated with 1087 M S Road Manning, South Carolina . Further, a records search in CLEAR indicates no one by the name of Frank Hill is associated with 9552 Blanche Avenue Garden Grove, California. I know from training and experience that individuals shipping narcotics through the mail may use inaccurate, incomplete, or fictitious sender and/or addressee information as a way to conceal the identity of the sender and/or intended recipient.
11. Postal Inspector Gasser contacted Special Agent Matt Downey with the South Carolina Law Enforcement Division (SLED) for assistance. Special Agent Downey, a trained K-9 handler, and Nadia, a certified narcotics detection dog, conducted an exterior examination of the subject parcel. The subject parcel was placed in a room at the Clarendon County Sheriff's Office with three other boxes known to not contain narcotics. Nadia was allowed to search the room and showed a behavior change by exhibiting a more concentrated breathing pattern and sniffing at the subject parcel. Nadia's became erect and she wagged her tail. Nadia then pawed at the parcel. Special Agent Downey said this constituted a positive alert indicating the presence of the scent of a controlled substance emanating from the subject parcel.
12. Special Agent Downey and Nadia are certified by Custom K-9 Unlimited. Their last certification was November 2018. Special Agent Downey has been Nadia's handler since 2011. Special Agent Downey said Nadia has examined approximately 316 parcels with approximately 10 false alerts for an accuracy of 97%. Special Agent Downey said Nadia is certified to detect the scent of marijuana, cocaine, methamphetamine, heroin and derivatives thereof.
13. Based on this information, your affiant believes probable cause exists that the subject parcel contains evidence, fruits or instrumentalities of narcotics trafficking in violation of Title 21 U.S.C. §§ 841(a)(1) and 846. The subject parcel has been maintained unopened in the custody of your affiant pending issuance of a search warrant.

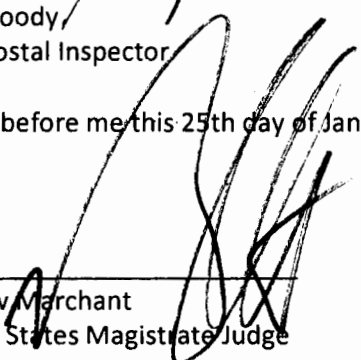
¹ CLEAR is a public records database containing information derived from commercially available data sources on addresses and persons associated with addresses for utilization for law enforcement investigative and intelligence purposes.

14. I hereby request the court issue a search warrant for the subject parcel.
15. This affidavit has been reviewed by AUSA Nick Bianchi.



L. R. Moody,
U. S. Postal Inspector

Sworn before me this 25th day of January 2019



Bristow Marchant
United States Magistrate Judge